

EXHIBIT C

Witness	Form of Testimony	Substance of Testimony	Interpreter	Objection
		of it. Strategic's damages.		
J. Michael Waller	In Person By deposition only if Court finds unavailable	Events involving the introduction of Strategic Vision to Guo Wengui, Yvette Wang, and Eastern Profit. Negotiation and execution of the Research Agreement; events involving Strategic's work under the Research Agreement and Eastern's termination of it. Strategic's damages. Guo's actions in the U.S. against dissidents and their supporters.	No	No
Yvette Wang	Live By Deposition	Guo's negotiation and approval of the Research Agreement; Guo's control of Golden Spring, Eastern, and their performance and termination of the	No	No

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		Agreement. Guo Wengui and entities associated with him.		
Guo Wengui a/k/a Miles Kwok	Live By Deposition if unavailable	Representations made to Strategic regarding Guo's status, background, and purposes in obtaining and using research under the Research Agreement; Eastern's failure to perform; ACA's relationship to Eastern and Guo's other entities.	Yes	No
Chunguang Han	Live By Deposition if unavailable	Association with Eastern Profit; Eastern Profit's business and finances; ACA and William Je; involvement with Guo Wengui and Guo's entities.	Yes	No
Karin Maistrello	By Deposition	Association with ACA Capital, ACA's knowledge of the case and attempts to avoid discovery.	No	Yes, F.R.E. 402-03

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Lianchao Han	By Deposition	Introduction of Strategic to Guo Wengui, performance of the Research Agreement; Guo Wengui's purposes for the Research Agreement; Guo's pledges of loyalty to the CCP.	No	No
William Gertz	By Deposition	Introduction of Strategic to Guo Wengui, Guo Wengui's purposes for the Research Agreement; ACA payment for Guo projects.	No	No
Sasha Gong	Live or by Deposition if unavailable.	Guo Wengui's status and background; Guo's actions in the U.S. against dissidents and their supporters; matters associated with the context for the Research Agreement.	No	F.R.E. 402, 403, 602, 701, 801-02, 1001-04

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William Je	Live if he can be found.	ACA Capital's wiring of funds to Strategic Vision January 2018; Guo Wengui	No	F.R.E. 402, 403
Jessica Ju	Live only if needed to establish admissibility	Authentication for written translation work done by witness on pretrial material produced in discovery	No	F.R.E. 402, 403
Amelia Coluccio	Deposition	Power of Attorney by Eastern Profit to Golden Spring; relationship between ACA, Eastern and other entities; involvement of Guo Wengui with Golden Spring	No	F.R.E. 402, 403
Bob Fu	Live	Chinese dissident and pastor living in U.S. Experience with Guo Wengui, including receiving threats from Guo about Fu's activities as a Chinese dissident and advocate for freedom in China	No	F.R.E. 402, 403, 602, 701, 801-02; Untimely identification.

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Witnesses on Eastern's Witness List or Revised Witness List				